# C 3. ENVIRONMENTAL PROTECTION AGE REGION IV, ATHENS, GEORGIA

38 0259

Houdas Mundrick.

M Whair

## **MEMORANDUM**

DATE: 5,500 10 1888

SUBJECT: Comments on December 9, 1988 Response to EPA Region IV and SCDHEC

Comments on the RI/FS POP for the Medley Farm Site, Sirrine

Environmental Consultants, ESD Project No. 89E-133,

EPA I.D. No. SCD 980558142

FROM: Donald Hunter, Hydrogeologist

Hazardous Waste Section

Environmental Compliance Branch Environmental Services Division

TO: Jon K. Bornholm, Superfund Project Manager

North Site Management Section

Superfund Branch

Waste Management Division

THRU: M. D. Lair, Chief

Hazardous Waste Section

Environmental Compliance Branch Environmental Services Division

FEB 1 4 1989

EPA — REGION IV

ATLANTA, GA.

I have reviewed Sirrine's December 9, 1988, response to EPA's and SCDHEC's comments on the earlier draft of the POP for the Medley Farm Site. Although most of our comments, forwarded to you October 27, 1988, have been addressed satisfactorily in this response, several issues still remain to be resolved. These are as follows, and are referenced to the comment/response numbers indicated on the recent correspondence.

## Comment

### Number

#### Response

- 6. The method or procedure referenced for generating organic-free water (EPA Method 601/602, Section 6.11-6.13) is acceptable as long as Section 6.1 of the method is also adhered to. Under this section, the interferents should be below the CRQL (Contract Required Quantitation Limit) as specified in the EPA Contract Laboratory Program.
- 16. This comment was not addressed. As stated in our previous comments, all downhole equipment should be standard cleaned, regardless of whether or not is intended purpose is drilling or sampling.
- 18. Second bullet Deionized water is not a substitute for organic-free water after the solvent rinse step in the cleaning procedures.
- 19. See response for comment number 16 above.
- 20. Region IV is reevaluating soil sampling procedures for samples collected for purgeable organic analyses (VOA's). At this time, we find it acceptable, if not preferrable, to collect these types of

3 8 0260.

samples as discrete, grab samples, rather than subjecting them to the conditions associated with thorough sample mixing. We would, therefore, approve of the previous sampling method proposed for these types of samples.

- 28. See response for comment number 16 above.
- If bentonite pellet hydration times of less than 8 hours are used, as per the earlier EPA approval, ESD recommends that some precaution be taken to minimize the possibility of jetting of the pellets during grouting, such as a side-discharge on the grout pipe.

If you have any questions regarding these comments, please call me at FTS 250-3351.

cc: Finger/Patton Lair/Mundrick Knight